

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)
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This document relates to:

All Actions

DECLARATION OF MEGAN WOLFE BENETT

I, Megan Wolfe Benett, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury the following:

1. I am an attorney duly admitted to practice before this Court, am a partner at Kreindler & Kreindler LLP (“Kreindler”) and represent the family members of those killed in the 9/11 Terrorist Attacks as well as the survivors of those attacks. I am fully familiar with the history of this lawsuit and this Court’s inquiry into the Yahoo! News article published by Michael Isikoff on July 15, 2021.

2. On June 17, 2021 and June 18, 2021 I took the deposition of Kingdom of Saudi Arabia official Musaed al-Jarrah via Zoom.

3. I learned on July 15, 2021 that Yahoo! News investigative reporter Michael Isikoff had published an article in which he stated that he had obtained a copy of the transcript of the deposition of Jarrah. That day, I discussed the Isikoff article with others at Kreindler working on the 9/11 litigation and, subsequently, in a conference call with other members of the Plaintiffs’ Executive Committees in this lawsuit.

4. The paralegal I previously described as having been on the Jarrah transcript distribution list from the court reporting service Golkow Litigation Services was Debra Pagan. *See* ECF No. 7016 at 3.

5. My specific answers to the inquiry of this Court's Order, ECF No. 7082 at 1, (set forth in italics) are underscored below:

- *identify all communications with Michael Isikoff or anyone acting on his behalf, whether oral or written, from June 1, 2021, to August 1, 2021. Any written communication must be provided to the Court;*
 - I had no communications with Michael Isikoff or anyone acting on his behalf.
- *declare whether they have ever discussed the contents of the Musaed Al Jarrah deposition with Michael Isikoff or anyone acting on his behalf. Any communication must be described in detail, including whether portions of the transcript were read or testimony was described;*
 - I have not discussed the contents of the deposition with Michael Isikoff or anyone acting on his behalf.
- *state every person with whom they shared the Al Jarrah deposition transcript who has not already supplied the Court with a declaration in this investigation; and*
 - None.
- *state every person that they know had access to the deposition transcripts who has not already supplied a declaration in this investigation.*
 - None.

6. For the first time today I learned the information set forth in the declaration of John Fawcett.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York
September 27, 2021

KREINDLER & KREINDLER LLP

By: /s/ Megan Wolfe Benett
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